

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF SOUTH CAROLINA**

IN RE:

**Travinia Italian Kitchen at Richmond, LLC,

Debtor.**

**Case # 19-01325-hb

Chapter 7**

**RESPONSE TO MOTION FOR ALLOWANCE AND
IMMEDIATE PAYMENT OF 503(b)(9) CLAIM**

West Town Bank & Trust, the first and primary secured creditor herein, hereby responds to the Notice of Reinhart Foodservice, LLC's ("Reinhart") Motion for Allowance and Immediate Payment of 503(b)(9) Claim, filed at Docket No. 25 (the "Motion"), as follows:

West Town Bank & Trust f/k/a West Town Savings Bank ("West Town") is the first and primary secured creditor of the Debtor by virtue of a certain executed security agreement and properly perfected UCC-1 security interest which attaches to all of the Debtor's assets including, but not limited to, any and all equipment, inventory, furniture and fixtures, monies, cash, cash equivalents, and contract rights ("Collateral"). The Trustee has filed a motion to sell the Collateral for an amount substantially less than the debt owed to West Town, and West Town's consent is required for the proposed sale. West Town previously consented to the sale of its Collateral with payment to West Town of \$120,000.00 upon the sale, as set forth in the Trustee's sale notice. However, West Town has now been informed that the Buyer is now claiming that there was a "typographical error" in his letter of intent, and the Trustee intends to modify the proposed sale terms. West Town object to the modification that has been proposed.

West Town does not take a position as to whether Reinhart is entitled to an administrative priority claim, but objects to the use of its Collateral for payment of any such claim.

West Town reserves its rights with regard to the proposed sale of its Collateral, including but not limited to its right to consent or object.

RESPECTFULLY SUBMITTED on this the 30th day of April, 2019, at Murrells Inlet, South Carolina.

BARTON BRIMM, PA

BY: /s/Christine E. Brimm, #6313
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CERTIFICATE OF SERVICE

I, Connie Fraser, hereby certify that I, on behalf of Christine E. Brimm, District Court I.D. #6313, Counsel for West Town Bank & Trust, served a copy of the **Response to Motion for Allowance and Immediate Payment of 503(b)(9) Claim filed April 30, 2019**, on the Office of the United States Trustee via electronic filing and electronic transmission through CM/ECF, pursuant to SC LBR 9036-1, and on the parties in interest as shown below, via CM/ECF and/or U.S. Mail, as indicated, on April 30, 2019.

John K. Fort, Trustee
P.O. Box 789
Drayton, SC 29333
Via CM/ECF and U.S. Mail

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BARTON BRIMM, PA

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